

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JIM DAWS TRUCKING, LLC,

Plaintiff,

v.

DAWS, INC., JAMES R. DAWS,
LANA R. DAWS, DAWS TRUCKING,
INC., and COLUMBUS
TRANSPORTATION & LOGISTICS,
LLC,

Defendants.

CASE NO. 4:24-CV-3177

**DECLARATION OF
CAITLIN SUPER**

I, Caitlin Super, hereby declare as follows:

1. I am above the age of 19, and I am competent to testify. I have personal knowledge of all facts set forth herein. I live near Seward, Nebraska.

2. In August 2024, RaNae Muenchrath convinced me to apply for a job at Jim Daws Trucking, LLC ("JDT"). I was hired by JDT in August 2024 and worked in permitting and as the fuel manager. RaNae was the reason I came to work for JDT.

3. When I was hired, RaNae told me that eventually Jim Daws would retire and Rick Fernandez ("Rick") would take over JDT's operations.

4. I'm a single mother and RaNae and Jim Daws gave me flexibility to work around my kids' schedules. In the short time I was there, I liked working for Jim Daws and the office staff there was like a little family.

5. During my employment with JDT Rick was rarely in the Milford office. I interacted with Rick only a couple of times. He never introduced himself to me and I didn't even know that he owned JDT. In my limited interactions with Rick, I got bad vibes from him. For example, on the rare occasions when Rick would come into the office, he wouldn't arrive until around 1:30pm. He would set his laptop up in the extra office, and not interact with the employees. He would leave around 4:30pm. I did not have confidence that Rick knew what he was doing with respect to operating

JDT. He was a guy from Chicago who would show up to work pretending to fit into Milford by wearing what I would call plastic cowboy boots.

6. In the short time I was employed at JDT, my observations were that JDT employees did not like or respect Rick. I shared that sentiment.

7. I grew concerned that Rick's plan was to eventually move the JDT office operations to either the Omaha area, Lincoln, or Chicago, where Rick owned another trucking company. I had serious concerns about whether I would have a job at JDT in Milford for very long.

8. On or around Tuesday September 24, 2024, RaNae advised me that Jim Daws was retiring on Monday, September 30, 2024, and that Ranae was resigning on Friday, September 27, 2024. This was the first I had heard of a set retirement date for Jim Daws.

9. Based on my observations of Rick, I knew I didn't want to work for him. Once I found out RaNae was leaving, I immediately determined that if RaNae wasn't going to work at JDT, then I didn't want to work there either.

10. On September 24, 2024, I sent an e-mail to Rick advising him that Friday September 27, 2024, would be my last day. I never received a response from him.

11. It was my understanding that during the week of September 23, 2024, Rick wanted to meet with JDT employees to discuss the situation. We waited for the meeting but Rick never showed up.

12. Neither Jim Daws, nor anyone else, ever asked me or encouraged me to resign from JDT. I don't believe I even spoke with Jim Daws the week of September 23, 2024. I have never spoken with Jim Daws about quitting my job at JDT.

13. I am not aware of anyone orchestrating or coordinating a resignation of employees from JDT. No one orchestrated or coordinated my resignation.

14. On Friday September 27, 2024, I was working in the Milford office when Rick turned off the internet and phones and disabled all of our access to work email accounts. Rick then went into the server room with a screwdriver. Rick shut down all of the computers.

15. When Rick came out of the server room, he told all the employees in the office, including me "You can all get off my property." I left.

16. Later, a JDT employee, Bill Moltahn, asked me to come work for JDT at its new Lincoln office. I have young kids and don't want to drive to Lincoln to work every day.

17. Before I resigned from JDT, no one offered me employment anywhere else. I didn't have a backup plan as far as getting another full-time job. I am a nurse who works PRN, and after I resigned from JDT I picked up a few extra shifts. Both before and while I was working at JDT, I did some bookkeeping on the side and I continued that work.

18. Jim Daws had nothing to do with my decision to resign my employment at JDT.

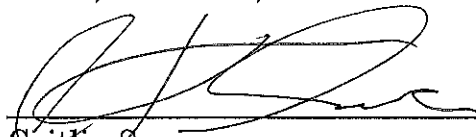
19. Neither Jim Daws, nor anyone else, ever promised me anything if I quit JDT.

20. In late 2024, RaNae offered me a job at Loyal Trucking ("Loyal"), a company she owned with Corey Stull. I accepted and currently work for Loyal as a dispatcher. I have never seen Jim Daws at Loyal and am aware of no evidence that Jim is involved in Loyal's operations.

21. I am not aware that since he left employment with JDT that Jim Daws is involved in any other trucking business.

22. I never heard Jim Daws say anything negative about JDT or Rick Fernandez and am aware of no evidence that he has done so.

I declare, under penalty of perjury, that the foregoing declaration, executed on the 17 day of January, 2025, at Milford, Nebraska, is true and correct.


Caitlin Super

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